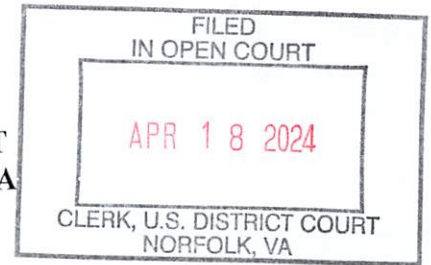


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division



UNITED STATES OF AMERICA

v.

CORTEZ DAYSHAWN BUMPHUS

a/k/a "Co"

(Counts 1, 2, 3, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21)

DONTAE LAMONT DOZIER

a/k/a "2 Chains"

(Count 1, 2, 3, 33, 34, 35, 36, 37, 38, 39, 40, 41)

ZURI ANTHONY DRE'-OLIVER
REEVES

a/k/a "Zu" a/k/a "ZuWaap"

(Counts 1, 2, 3, 83, 84, 85, 86, 87)

DILQUON BEST

a/k/a "Quon" a/k/a "DQ"

(Counts 1, 2, 3, 4, 5)

ROBERT MOSES, JR.

a/k/a "Bank" a/k/a "Bankroll"

(Counts 1, 2, 3, 70, 71, 72, 73, 74, 75, 76, 77)

ANTHONY BRITT

a/k/a "Unc" a/k/a "Fathead"

(Counts 2, 3, 6, 7, 8, 9, 10, 11)

STEPFON LAMOUNT BUMPHUS

a/k/a "Fon"

(Counts 2, 3, 22, 23, 24, 25, 26, 27)

DANA DASHER

(Count 2, 3)

TREVELL DAVIS, JR.

a/k/a "Tee Savage" a/k/a "Savage"

(Count 2, 3, 28, 29, 30, 31, 32)

UNDER SEAL

CRIMINAL NO. 4:23CR54

21 U.S.C. § 848

Continuing Criminal Enterprise

(Count 1)

21 U.S.C. §§ 846 and 841

Conspiracy to Possess with Intent to

Distribute and Distribute Marijuana,

Cocaine, Oxycodone, Psilocybin,

Promethazine, and Fentanyl

(Count 2)

18 U.S.C. § 1956(h)

Conspiracy to Launder Money

(Count 3)

21 U.S.C. § 841(a)(1)

Distribute Fentanyl, Oxycodone, and

Marijuana

(Counts 4, 6, 7, 12, 13, 14, 15, 22, 23, 24, 25,

28, 29, 30, 33, 42, 47, 48, 54, 58, 59, 62, 63, 64,

65, 70, 71, 79, 80, 83, 88, 91, 94, 95, 96, 103,

104, 105, 108, 109, 110, 118, 120, 122, 125,

126)

21 U.S.C. § 856(a)(2)

Maintaining a Drug Involved Premises

(Count 10, 20, 37, 60, 75)

18 U.S.C. §§ 922(o) and 924(a)(2)

Illegal Possession of a Machine Gun

(Count 117)

18 U.S.C. § 924(c)

Possess Firearm During Drug Trafficking

(Counts 8, 9, 17, 18, 19, 27, 31, 32, 34, 35, 36,

52, 66, 67, 68, 73, 74, 82, 84, 85, 86, 93, 100,

101, 107, 115, 116)

FARRAH FAIR)	18 U.S.C. § 922(g)(1)
a/k/a “10K Fay”)	Felon in Possession of Firearm
(Counts 2, 3, 42, 43, 44))	(Count 16, 51, 98, 99, 113, 114)
)	
ANDREA HUNT)	18 U.S.C. § 1503
(Count 2, 45, 46))	Obstruction of Justice
)	(Count 46)
)	
KAMANI JOHNSON)	
a/k/a “Komma” a/k/a “Kazz”)	21 U.S.C. § 843(b)
(Counts 2, 3, 47, 48, 49, 50, 51, 52, 53))	Use of a Communication Facility in
)	Furtherance of Drug Trafficking
CARL EUGENE MITCHELL, JR.)	(Counts 5, 11, 21, 26, 38, 44, 45, 50, 55, 61, 69,
a/k/a “Lil Man”)	72, 78, 87, 90, 92, 97, 102, 106, 111, 119, 121,
(Counts 2, 3, 54, 55, 56, 57))	123, 127)
)	
EARVIN JEROME MOORE)	18 U.S.C. § 1952
a/k/a “Gooch”)	Interstate Travel in Aid of Racketeering
(Counts 2, 3, 58, 59, 60, 61))	(Counts 43, 49, 56, 81, 89, 112, 124)
)	
FREDDIE JAMAUL MOORE)	18 U.S.C. § 1344
a/k/a “Goons”)	Bank Fraud
(Counts 2, 3, 62, 63, 64, 65, 66, 67, 68,)	(Count 40)
69))	
)	18 U.S.C. § 1029(e)(1)
RAHKIM ONEIL PERRY)	Access Device Fraud
a/k/a “Rahk”)	(Counts 53, 77)
(Counts 2, 3, 78, 79, 80, 81, 82))	
)	18 U.S.C. § 1028(a)(1)
GRACIELA RUIZ-BERNABE)	Aggravated Identity Theft
a/k/a “Grace”)	(Counts 41)
(Counts 2, 3, 88, 89, 90))	
)	26 U.S.C. §§ 5841, 5861(d), 5871
JAMONTE STEPHENS)	Possession of an Unregistered Firearm
a/k/a “Dot”)	(Count 39)
(Counts 2, 3, 91, 92, 93))	
)	18 U.S.C. § 371
ANTONIO LAMONT STOWES)	Conspiracy to Commit Offenses Against the
a/k/a “Tone”)	United States
(Counts 2, 3, 94, 95, 96, 97, 98, 99, 100,)	(Counts 57, 76)
101))	
)	18 U.S.C. §§ 924(d), 982(a)(1); 21 U.S.C. §
CHRISTINA MICHELE THOMPSON)	853; 28 U.S.C. § 2461
(Counts 2, 3, 102))	Forfeiture Allegation
)	
)	
)	

NAJAE VAUGHN)
a/k/a "Laylo")
(Counts 2, 3, 103, 104, 105, 106, 107))
)
THADDEUS WILLIAMS IV)
a/k/a "Thad")
(Counts 2, 3, 108, 109, 110, 111, 112,)
113, 114, 115, 116, 117))
)
THOMAS WILSON)
a/k/a "Chinkman")
(Counts 2, 3, 118, 119))
)
GUANG YANG)
a/k/a "Ryan")
(Counts 2, 3, 120, 121))
)
ALICIA ZAMORA)
(Counts 2, 3, 122, 123, 124))
)
TIESHA BEST)
a/k/a "Ty")
(Counts 2, 3, 125, 126, 127))

SECOND SUPERSEDING INDICTMENT

April 2024 - at Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

Between 2017 and 2024, within the Eastern District of Virginia and elsewhere, the defendants, **CORTEZ DAYSHAWN BUMPHUS a/k/a “Co”, DONTAE LAMONT DOZIER a/k/a “2 Chains”, DILQUON BEST a/k/a “Quon” a/k/a “DQ”, ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”, and ZURI ANTHONY DRE’-OLIVER REEVES a/k/a “Zu” a/k/a “ZuWaap”** did engage in a continuing criminal enterprise by committing a continuing series of felony violations of Title 21, United States Code Section 841(a)(1), which continuing series of violations was undertaken by defendant in concert with at least five other persons with respect to whom defendant occupied a position as organizer, a supervisory position, and some other position of management, and from which continuing series of violations defendant obtained substantial income and resources. The continuing series of violations undertaken by defendants **CORTEZ DAYSHAWN BUMPHUS, DONTAE LAMONT DOZIER, DILQUON BEST, ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”, and ZURI ANTHONY DRE’-OLIVER REEVES** included but was not limited to the conduct in Count Two of this indictment which is incorporated by reference in this count.

(In violation of Title 21, United States Code, Section 848.)

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between 2017 and 2024, in the Eastern District of Virginia and elsewhere, the defendants, **DILQUON BEST a/k/a “Quon” a/k/a “DQ”, TIESHA BEST a/k/a “TY”, ANTHONY BRITT a/k/a “Unc” a/k/a “Fathead”, CORTEZ DAYSHAWN BUMPHUS a/k/a “Co” , STEPFON LAMOUNT BUMPHUS a/k/a “Fon”, DANA DASHER, TREVELL DAVIS, JR. a/k/a “Tee Savage” a/k/a “Savage”, DONTAE LAMONT DOZIER a/k/a “2 Chains”, FARRAH FAIR a/k/a “10K Fay”, ANDREA HUNT, KAMANI JOHNSON a/k/a “Komma” a/k/a “Kazz”, CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”, EARVIN JEROME MOORE a/k/a “Gooch”, FREDDIE JAMAUL MOORE a/k/a “Goons”, ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”, RAHKIM ONEIL PERRY a/k/a “Rahk”, ZURI ANTHONY DRE’-OLIVER REEVES a/k/a “Zu” a/k/a “ZuWaap”, GRACIELA RUIZ-BERNABE a/k/a “Grace”, JAMONTE STEPHENS a/k/a “Dot”, ANTONIO STOWES a/k/a “Tone”, CHRISTINA MICHELE THOMPSON, NAJAE VAUGHN a/k/a “Laylo”, THADDEUS WILLIAMS IV a/k/a “Thad”, THOMAS WILSON a/k/a “Chinkman”, GUANG YANG a/k/a “Ryan”, and ALICIA ZAMORA did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together with other persons known and unknown to the grand jury to commit the following offenses against the United States:**

1. Distribute 1000 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

2. Possess with intent to distribute 1000 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

3. Distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

4. Possess with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

5. Distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

6. Possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

7. Distribute a mixture or substance containing a detectable amount of oxycodone, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

8. Possess with intent to distribute a mixture or substance containing a detectable amount of oxycodone, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

9. Distribute a mixture or substance containing a detectable amount of Psilocybin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

10. Possess with intent to distribute a mixture or substance containing a detectable amount of Psilocybin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

11. Distribute a mixture or substance containing a detectable amount of Promethazine, a Schedule V controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(E)(iii).

12. Possess with intent to distribute a mixture or substance containing a detectable amount of Promethazine, a Schedule V controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(E)(iii).

(All in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A)).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

Beginning in or about 2017 through 2024, in the Eastern District of Virginia and elsewhere, **DILQUON BEST a/k/a “Quon” a/k/a “DQ”, TIESHA BEST a/k/a “TY”, ANTHONY BRITT a/k/a “Unc” a/k/a “Fathead”, CORTEZ DAYSHAWN BUMPHUS a/k/a “Co” , STEPFON LAMOUNT BUMPHUS a/k/a “Fon”, DANA DASHER, TREVELL DAVIS, JR. a/k/a “Tee Savage” a/k/a “Savage”, DONTAE LAMONT DOZIER a/k/a “2 Chains”, FARRAH FAIR a/k/a “10K Fay”, KAMANI JOHNSON a/k/a “Komma” a/k/a “Kazz”, CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”, EARVIN JEROME MOORE a/k/a “Gooch”, FREDDIE JAMAUL MOORE a/k/a “Goons”, ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”, RAHKIM ONEIL PERRY a/k/a “Rahk”, ZURI ANTHONY DRE’-OLIVER REEVES a/k/a “Zu” a/k/a “ZuWaap”, GRACIELA RUIZ-BERNABE a/k/a “Grace”, JAMONTE STEPHENS a/k/a “Dot”, THOMPSON, ANTONIO STOWES a/k/a “Tone”, CHRISTINA MICHELE NAJAE VAUGHN a/k/a “Laylo”, THADDEUS WILLIAMS IV a/k/a “Thad”, THOMAS WILSON a/k/a “Chinkman”, GUANG YANG a/k/a “Ryan”, and ALICIA ZAMORA, the defendants herein, did knowingly, willfully, and unlawfully combine conspire, confederate and agree with each other and other persons, both known and unknown, to knowingly, willfully, and unlawfully conduct, attempt to conduct, and cause to be conducted financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute narcotics, in violation of Title 21, United States Code, Section 846, with the intent to conceal and disguise the carrying on of specified unlawful activity, that is, conspiracy to distribute Marijuana, Cocaine, Oxycodone, Psilocybin, Promethazine, and Fentanyl, in violation of Title 21, United States**

Code, Section 846, and that, while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

(All in violation of Title 18, United States Code, Section 1956(h))

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 6, 2022, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **DILQUON BEST a/k/a “Quon” a/k/a “DQ”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 3, 2023, in the Eastern District of Virginia, the defendant, **DILQUON BEST a/k/a “Quon” a/k/a “DQ”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 7, 2022, in the Eastern District of Virginia and elsewhere, the defendant, **ANTHONY BRITT a/k/a “Unc” a/k/a “Fathead”** did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D))

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 5, 2020, in the Eastern District of Virginia and elsewhere, the defendant, **ANTHONY BRITT a/k/a “Unc” a/k/a “Fathead”** did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D))

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 23, 2022, in the Eastern District of Virginia and elsewhere, the defendant **ANTHONY BRITT a/k/a “Unc” a/k/a “Fathead”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 5, 2023, in the Eastern District of Virginia and elsewhere, the defendant **ANTHONY BRITT a/k/a “Unc” a/k/a “Fathead”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance, and oxycodone, a Schedule II controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between 2020 and 2023, in the Eastern District of Virginia and elsewhere, the defendant **ANTHONY BRITT a/k/a “Unc” a/k/a “Fathead”**, did unlawfully and knowingly use and maintain a place located at 226 Breckinridge Court, Hampton, VA for the purpose of manufacturing, distributing, and using marijuana, a Schedule I controlled substance; oxycodone, a Schedule II controlled substance; and Fentanyl, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 856)

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 7, 2022, in the Eastern District of Virginia, the defendant, **ANTHONY BRITT a/k/a “Unc” a/k/a “Fathead”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 5, 2023, in the Eastern District of Virginia and elsewhere, the defendant, **CORTEZ DAYSHAWN BUMPHUS a/k/a “Co”** did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D))

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 5, 2023, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **CORTEZ DAYSHAWN BUMPHUS a/k/a “Co”** did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C))

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 5, 2023, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **CORTEZ DAYSHAWN BUMPHUS a/k/a “Co”** did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of Psilocybin, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C))

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 16, 2023, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **CORTEZ DAYSHAWN BUMPHUS a/k/a “Co”** did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D))

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 5, 2023, in the Eastern District of Virginia and elsewhere, the defendant **CORTEZ DAYSHAWN BUMPHUS a/k/a “Co”**, knowing that he had been previously convicted of a felony crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess, in and affecting interstate or foreign commerce, a firearm, to wit: a Glock 22 handgun, a Glock 17 handgun, and a Smith and Wesson 9mm handgun.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 5, 2023, in the Eastern District of Virginia and elsewhere, the defendant **CORTEZ DAYSHAWN BUMPHUS a/k/a “Co”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 22, 2023, in the Eastern District of Virginia and elsewhere, the defendant **CORTEZ DAYSHAWN BUMPHUS a/k/a “Co”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 5, 2023, in York County, in the Eastern District of Virginia and elsewhere, the defendant **CORTEZ DAYSHAWN BUMPHUS a/k/a “Co”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 5, 2023, in the Eastern District of Virginia and elsewhere, the defendant **CORTEZ DAYSHAWN BUMPHUS a/k/a “Co”**, did unlawfully and knowingly use and maintain a place located at 5124 Goldsboro Drive, #7, Hampton, VA for the purpose of manufacturing, distributing, and using marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Section 856)

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 15, 2023, in the Eastern District of Virginia, the defendant, **CORTEZ DAYSHAWN BUMPHUS a/k/a “Co”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 2, 2023, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **STEPFON LAMOUNT BUMPHUS a/k/a “Fon”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2023, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **STEPFON LAMOUNT BUMPHUS a/k/a “Fon”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 7, 2023, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **STEFFON LAMOUNT BUMPHUS a/k/a “Fon”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance, and a detectable amount of oxycodone, a Schedule II controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 8, 2023, in the Eastern District of Virginia and elsewhere, the defendant, **STEPFON LAMOUNT BUMPHUS a/k/a “Fon”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 20, 2022, in the Eastern District of Virginia, the defendant, **STEPFON LAMOUNT BUMPHUS a/k/a “Fon”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2023, in the Eastern District of Virginia and elsewhere, the defendant **STEPFON LAMOUNT BUMPHUS a/k/a “Fon”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 6, 2023, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **TREVELL DAVIS, JR. a/k/a “Tee Savage” a/k/a “Savage”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 11, 2023, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **TREVELL DAVIS, JR. a/k/a “Tee Savage” a/k/a “Savage”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 19, 2023, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **TREVELL DAVIS, JR. a/k/a “Tee Savage” a/k/a “Savage”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 6, 2023, in the Eastern District of Virginia and elsewhere, the defendant **TREVELL DAVIS, JR. a/k/a “Tee Savage” a/k/a “Savage”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute oxycodone, a Schedule II controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between 2021 and 2023, in the Eastern District of Virginia and elsewhere, the defendant **TREVELL DAVIS, JR. a/k/a "Tee Savage" a/k/a "Savage"**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute oxycodone, a Schedule II controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2023, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **DONTAE LAMONT DOZIER a/k/a “2 Chains”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2023, in the Eastern District of Virginia and elsewhere, the defendant **DONTAE LAMONT DOZIER a/k/a “2 Chains”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I narcotic controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 29, 2023, in the Eastern District of Virginia and elsewhere, the defendant **DONTAE LAMONT DOZIER a/k/a “2 Chains”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: conspiracy to possess with intent to distribute narcotics as charged in Count Two of the indictment.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 18, 2022, in the Eastern District of Virginia and elsewhere, the defendant **DONTAE LAMONT DOZIER a/k/a “2 Chains”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between 2017 and 2023, in the Eastern District of Virginia, the defendant **DONTAE LAMONT DOZIER a/k/a “2 Chains”**, did unlawfully and knowingly manage, and control real property and improvements located at 10103 Jefferson Ave., Newport News, Virginia, as an owner and occupant, and did knowingly and intentionally make available for use said place for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance.

(All in violation of Title 21, United States Code, Section 856(a)(2))

COUNT THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 18, 2022, in the Eastern District of Virginia, the defendant, **DONTAE LAMONT DOZIER a/k/a “2 Chains”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2023, in Chesapeake, Virginia, within the Eastern District of Virginia, the defendant, **DONTAE LAMONT DOZIER a/k/a “2 Chains”**, knowingly possessed a firearm, to wit; a silencer (as defined in section 921 of Title 18 of the United States Code), not registered to him in the National Firearms Registration and Transfer Record.

(All in violation of 26 U.S.C. §§ 5841, 5861(d), 5871 (Possession of an Unregistered Firearm))

COUNT FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2021, in the Eastern District of Virginia and elsewhere, **DONTAE LAMONT DOZIER a/k/a “2 Chains”**, knowingly and willfully executed and attempted to execute a scheme and artifice to defraud and to obtain the moneys, funds, credits, assets, securities owned by and under the custody and control of the financial institutions identified herein, each of which qualifies as a financial institution as defined under Title 18, United States Code, Section 20, by means of materially false and fraudulent pretenses, representations and promises, to wit: a fictitious transaction depicting the sale of vehicle in order to remove a liability, as requested by Bayport Credit Union, in order to qualify for a mortgage loan.

(All in violation of Title 18, United States Code, Sections 1344 and 2.)

COUNT FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2021, in the Eastern District of Virginia and elsewhere, the defendant, **DONTAE LAMONT DOZIER a/k/a “2 Chains”**, did unlawfully, knowingly and intentionally transfer, possess and use, without lawful authority, a means of identification of another during and in relation to felony violations of provisions contained in chapter 63 of Title 18 of the United States Code, to wit: Bank Fraud, in violation of Title 18, United States Code, Section 1344.

(All in violation of Title 18, United States Code, Sections 1028A(a)(1) and (c) and 2))

COUNT FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 16, 2021, in Richmond, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **FARRAH FAIR a/k/a “10K Fay”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 26, 2022, in the Eastern District of Virginia and elsewhere, defendant **FARRAH FAIR a/k/a “10K Fay”**, traveled in interstate commerce from the State of Virginia to the State of California, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

(In violation of Title 18, United States Code, §1952(a)(3))

COUNT FORTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 5, 2022, in the Eastern District of Virginia, the defendant, **FARRAH FAIR a/k/a “10K Fay”** did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT FORTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 10, 2022, in the Eastern District of Virginia, the defendant, **ANDREA HUNT**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT FORTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about the November 10, 2022, in the Eastern District of Virginia, the defendant, **ANDREA HUNT**, did corruptly obstruct and impede or endeavor to influence, obstruct and impede the due administration of justice a federal grand jury in the Eastern District of Virginia by informing **ZURI ANTHONY DRE'-OLIVER REEVES a/k/a "Zu" a/k/a "ZuWaap"** that he was the target of an ongoing investigation.

(In violation of Title 18, United States Code, Section 1503)

COUNT FORTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 5, 2022, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **KAMANI JOHNSON a/k/a “Komma” a/k/a “Kazz”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT FORTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 10, 2023, in the Eastern District of Virginia and elsewhere, the defendant, **KAMANI JOHNSON a/k/a “Komma” a/k/a “Kazz”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT FORTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about the June 1, 2022, in the Eastern District of Virginia and elsewhere, defendant **KAMANI JOHNSON a/k/a “Komma” a/k/a “Kazz”**, traveled in interstate commerce from the State of Virginia to the State of North Carolina, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

(In violation of Title 18, United States Code, §1952(a)(3))

COUNT FIFTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 5, 2022, in the Eastern District of Virginia, the defendant, **KAMANI JOHNSON a/k/a “Komma” a/k/a “Kazz”** did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT FIFTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 10, 2023, in the Eastern District of Virginia and elsewhere, the defendant **KAMANI JOHNSON a/k/a “Komma” a/k/a “Kazz”**, knowing that he had been previously convicted of a felony crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess, in and affecting interstate or foreign commerce, a firearm, to wit: a Smith and Wesson .40 caliber handgun.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)).

COUNT FIFTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 10, 2023, in the Eastern District of Virginia and elsewhere, the defendant **KAMANI JOHNSON a/k/a “Komma” a/k/a “Kazz”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT FIFTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 6, 2022, in the Eastern District of Virginia and elsewhere, the defendant KAMANI JOHNSON a/k/a “Komma” a/k/a “Kazz”, knowing that he had been previously convicted of a felony crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess, in and affecting interstate or foreign commerce, a firearm, to wit: a Glock handgun.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)).

COUNT FIFTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 25, 2022, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”**, did unlawfully, knowingly and intentionally distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT FIFTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2022, in the Eastern District of Virginia, the defendant, **CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT FIFTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about the December 23, 2022, in the Eastern District of Virginia and elsewhere, defendant **CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”**, traveled in interstate commerce from the State of Virginia to the State of California, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

(In violation of Title 18, United States Code, §1952(a)(3))

COUNT FIFTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between 2023 and 2024, in the Eastern District of Virginia and elsewhere, defendant **CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”**, the defendant herein, and others known and unknown, did knowingly and willfully combine, conspire, and agree with each other and others known and unknown, to commit the following offenses against the United States:

a. To knowingly and fraudulently facilitate the transportation, concealment, and sale of stolen cars intended for exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, in violation of Title 18, United States Code, Section 554.

b. To unlawfully transport, transmit and transfer in interstate and foreign commerce stolen goods, wares and merchandise, that is, stolen vehicles, of a value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud, in violation of Title 18, United States Code, Section 2314.

c. To receive, possess, and conceal certain stolen goods, wares and merchandise, that is, stolen vehicles, of a value of \$5,000 or more which had crossed state lines after having been stolen, in violation of Title 18, United States Code, Section 2315.

OVERT ACTS:

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Eastern District of Virginia and elsewhere:

(a) On or about September 16, 2022, Charles Barker Maserati Dealership reported the theft of a 2021 Dodge Challenger to the Virginia Beach Police Department. A review of security footage by police showed the 2021 Dodge Challenger was stolen on or about September 13, 2022, and appeared to be accessed with a key fob. The 2021 Dodge Challenger was traded into the dealership by Raven Drew, the girlfriend of Dontae Dozier, but the 2021 Dodge Challenger was previously observed regularly at Lux Auto during the investigative period. On October 3, 2023, during an interview with a Cooperating Witness (“CW#1”), CW#1 stated the 2021 Dodge Challenger belonged to Dontae Dozier and was traded in by Raven Drew. CW#1 stated **CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”**, used to drive the 2021 Dodge Challenger frequently. CW#1 knew **CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”** had a spare key fob for the 2021 Dodge Challenger. CW#1 knew **CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”** to have sold or traded the 2021 Dodge Challenger to the individual who later crashed the vehicle in January 2023 during a high-speed pursuit while fleeing the Virginia State Police. The driver of the 2021 Dodge Challenger, T.A., was a known member of the conspiracy and died as a result of the aforementioned crash. CW#1 knew **CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”** to have told another member of the conspiracy that he, **CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”**, took the vehicle. On October 15, 2022, during a Title-III wire intercept between Damian Gay, a member of the conspiracy, and W.B., Damian Gay told W.B. he wanted a trade a “2021 Scat Pack” for “bags”, or marijuana. Damain Gay told W.B. the vehicle was not “cleaned up yet” when W.B asked if the vehicle was “dirty”.

- (b) On or about October 13, 2023, **CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”**, requested Auto Rescue tow a 2023 Range Rover from 612 Dallas Court, Hampton, Virginia to 1505 West Pembroke Avenue, Hampton, Virginia. The 2023 Range Rover was determined to be stolen out of West Palm Beach, Florida.
- (c) On or about January 9, 2024, during the execution of a federal search warrant at 612 Dallas Court, Hampton, Virginia, a 2023 Volvo S90, known to be driven by **CARL EUGENE MITCHELL, JR. a/k/a “Lil Man”**, was located in the driveway. The 2023 Volvo S70 was determined to be stolen from a dealership in Franklin, Virginia, on or about October 27, 2023.

(All in violation of Title 18 United States Code, Section 371)

COUNT FIFTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 14, 2022, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **EARVIN JEROME MOORE a/k/a “Gooch”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D))

COUNT FIFTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2023, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **EARVIN JEROME MOORE a/k/a “Gooch”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT SIXTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between 2022 and 2023, in the Eastern District of Virginia, the defendant **EARVIN JEROME MOORE a/k/a “Gooch”**, did unlawfully and knowingly manage, and control real property and improvements located at Extra Space Storage, as a renter and occupant, and did knowingly and intentionally make available for use said place for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance.

(All in violation of Title 21, United States Code, Section 856(a)(2))

COUNT SIXTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 24, 2022, in the Eastern District of Virginia, the defendant, **EARVIN JEROME MOORE a/k/a “Gooch”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT SIXTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 3, 2023, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **FREDDIE JAMAUL MOORE a/k/a “Goons”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT SIXTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between 2021 and 2023, in the Eastern District of Virginia and elsewhere, the defendant, **FREDDIE JAMAUL MOORE a/k/a “Goons”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C)).

COUNT SIXTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 18, 2023, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **FREDDIE JAMAUL MOORE a/k/a “Goons”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT SIXTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2023, in Portsmouth, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **FREDDIE JAMAUL MOORE a/k/a “Goons”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT SIXTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 3, 2023, in the Eastern District of Virginia and elsewhere, the defendant **FREDDIE JAMAUL MOORE a/k/a “Goons”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I narcotic controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT SIXTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 11, 2023, in the Eastern District of Virginia and elsewhere, the defendant **FREDDIE JAMAUL MOORE a/k/a “Goons”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I narcotic controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT SIXTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2023, in the Eastern District of Virginia and elsewhere, the defendant **FREDDIE JAMAU MOORE a/k/a “Goon”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT SIXTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 9, 2022, 2022, in the Eastern District of Virginia, the defendant, **FREDDIE JAMAUL MOORE a/k/a “Goons”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT SEVENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2023, in the Eastern District of Virginia and elsewhere, the defendant, **ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT SEVENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between July 2020 to August 2021 in the Eastern District of Virginia and elsewhere, the defendant, **ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT SEVENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 23, 2022, in the Eastern District of Virginia, the defendant, **ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”** did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT SEVENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 4, 2023, in the Eastern District of Virginia and elsewhere, the defendant **ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance and oxycodone, a Schedule II controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT SEVENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between July 2020 to August 2021, in the Eastern District of Virginia and elsewhere, the defendant **ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT SEVENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between July 2020 and August 2021, in the Eastern District of Virginia, the defendant **ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”**, did unlawfully and knowingly manage, and control real property and improvements located at 1000 Cool Spring Court, Apt. 101, Hampton, Virginia, as an owner and occupant, and did knowingly and intentionally make available for use said place for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance.

(All in violation of Title 21, United States Code, Section 856(a)(2))

COUNT SEVENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between 2023 and 2024, in the Eastern District of Virginia and elsewhere, defendant **ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”**, the defendant herein, and others known and unknown, did knowingly and willfully combine, conspire, and agree with each other and others known and unknown, to commit the following offenses against the United States:

a. To knowingly and fraudulently facilitate the transportation, concealment, and sale of stolen cars intended for exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, in violation of Title 18, United States Code, Section 554.

b. To unlawfully transport, transmit and transfer in interstate and foreign commerce stolen goods, wares and merchandise, that is, stolen vehicles, of a value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud, in violation of Title 18, United States Code, Section 2314.

c. To receive, possess, and conceal certain stolen goods, wares and merchandise, that is, stolen vehicles, of a value of \$5,000 or more which had crossed state lines after having been stolen, in violation of Title 18, United States Code, Section 2315.

OVERT ACTS:

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Eastern District of Virginia and elsewhere:

- (d) On or about July 22, 2021, HPD attempted a traffic stop of a 2020 Dodge Charger stolen out of Anne Arundel County, Maryland, displaying license plates associated with a stolen Dodge Challenger out of Montgomery County, Maryland. The 2020 Dodge Charger fled from a traffic stop when the officer attempted to approach the vehicle. The 2020 Dodge Charger crashed while fleeing from police and the driver ran from the vehicle, but was later apprehended and identified as **ROBERT MOSES, JR. a/k/a "Bank" a/k/a "Bankroll"**. The vehicle was later inadvertently released by the police but was later observed by HPD parked in the driveway of a residence listed for **ROBERT MOSES, JR. a/k/a "Bank" a/k/a "Bankroll"**.
- (e) On or about August 26, 2021, a 2021 Dodge Durango was utilized during a shooting incident in Hampton, Virginia where police officers with the Hampton Police Division ("HPD") were targeted by gunfire. The 2021 Dodge Durango, later found to be abandoned, was determined to be stolen out of Montgomery County, Maryland. The license plated affixed to the vehicle returned to Pembroke Auto Group, a car dealership owned by the father of **ROBERT MOSES, JR. a/k/a "Bank" a/k/a "Bankroll"**. CW#1 and a second Cooperating Witness ("CW#2") both knew **ROBERT MOSES, JR. a/k/a "Bank" a/k/a "Bankroll"** and Damian Gay to have been in the vehicle and involved in the shooting. Additionally, third witness ("CW#3") spoke with HPD and identified "Hatch" and "BJ" as the individuals in the shooting. A known alias of **ROBERT MOSES, JR. a/k/a "Bank" a/k/a "Bankroll"** is "Brandon James".
- (f) On or about August 3, 2023, a homicide occurred in the vicinity of 226 Breckinridge Court, Hampton, Virginia. The victim of the homicide was found in a 2023 Mercedes

Benz S580 that was stolen during a carjacking in Washington, D.C. on or about July 30, 2023. It was later determined, through digital evidence, **ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”** was coordinating with the victim to sell stolen Mercedes Benz S580. Digital evidence showed **ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”** was due to receive a portion of the “42k” being paid for the vehicle.

(All in violation of Title 18 United States Code, Section 371)

COUNT SEVENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 2, 2022, in the Eastern District of Virginia, the defendant **ROBERT MOSES, JR. a/k/a “Bank” a/k/a “Bankroll”**, did unlawfully and knowingly and with intent to defraud, traffic in and use one or more unauthorized access devices, as defined in 18 United States Code, Section 1029(e)(3), and by such conduct did fraudulently attempt to obtain and did obtain monies from the Drug Enforcement Administration by presenting a fraudulent driver identification card and make a claim concerning the source of funds seized by the Drug Enforcement Administration, said conduct affecting interstate commerce.

(In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.)

COUNT SEVENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 29, 2022, in the Eastern District of Virginia, the defendant, **RAHKIM ONEIL PERRY a/k/a “Rahk”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT SEVENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 2, 2022, in the Eastern District of Virginia and elsewhere, the defendant, **RAHKIM ONEIL PERRY a/k/a “Rahk”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT EIGHTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 7, 2023, in the Eastern District of Virginia and elsewhere, the defendant, **RAHKIM ONEIL PERRY a/k/a “Rahk”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT EIGHTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 2, 2022, in the Eastern District of Virginia and elsewhere, defendant **RAHKIM ONEIL PERRY a/k/a “Rahk”**, traveled in interstate commerce from the State of Virginia to the State of California, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

(In violation of Title 18, United States Code, §1952(a)(3))

COUNT EIGHTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 5, 2023, in the Eastern District of Virginia and elsewhere, the defendant **RAHKIM ONEIL PERRY a/k/a “Rahk”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance and oxycodone, a Schedule II controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT EIGHTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 2, 2023, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **ZURI ANTHONY DRE’-OLIVER REEVES a/k/a “Zu” a/k/a “ZuWaap”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT EIGHTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 26, 2022, in the Eastern District of Virginia and elsewhere, the defendant **ZURI ANTHONY DRE'-OLIVER REEVES a/k/a "Zu" a/k/a "ZuWaap"**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I narcotic controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT EIGHTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 1, 2023, in the Eastern District of Virginia and elsewhere, the defendant **ZURI ANTHONY DRE'-OLIVER REEVES a/k/a "Zu" a/k/a "ZuWaap"**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: conspiracy to possess with intent to distribute narcotics as charged in Count Two of the indictment.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT EIGHTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2023, in the Eastern District of Virginia and elsewhere, the defendant **ZURI ANTHONY DRE'-OLIVER REEVES a/k/a "Zu" a/k/a "ZuWaap"**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: conspiracy to possess with intent to distribute narcotics as charged in Count Two of the indictment.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT EIGHTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 9, 2023, in the Eastern District of Virginia, the defendant, **ZURI ANTHONY DRE’-OLIVER REEVES a/k/a “Zu” a/k/a “ZuWaap”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT EIGHTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 20, 2023, in the Eastern District of Virginia and elsewhere, the defendant, **GRACIELA RUIZ-BERNABE a/k/a “Grace”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT EIGHTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about the May 20, 2023, in the Eastern District of Virginia and elsewhere, defendant **GRACIELA RUIZ-BERNABE a/k/a “Grace”**, traveled in interstate commerce from the State of Virginia to the State of California, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

(In violation of Title 18, United States Code, §1952(a)(3))

COUNT NINETY

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 2, 2022, in the Eastern District of Virginia, the defendant, **GRACIELA RUIZ-BERNABE a/k/a “Grace”** did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT NINETY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 5, 2023, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **JAMONTE STEPHENS a/k/a “Dot”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT NINETY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 5, 2022, in the Eastern District of Virginia, the defendant, **JAMONTE STEPHENS a/k/a “Dot”** did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT NINETY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 5, 2023, in the Eastern District of Virginia and elsewhere, the defendant **JAMONTE STEPHENS a/k/a “Dot”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT NINETY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 16, 2020, in the Eastern District of Virginia and elsewhere, the defendant, **ANTONIO STOWES a/k/a “Tone”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of Fentanyl, a Schedule II controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT NINETY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 23, 2024, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **ANTONIO STOWES a/k/a “Tone”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT NINETY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 8, 2023, in Surry, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **ANTONIO STOWES a/k/a “Tone”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of Fentanyl, a Schedule II controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT NINETY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 16, 2020, in the Eastern District of Virginia, the defendant, **ANTONIO STOWES a/k/a “Tone”** did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT NINETY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 23, 2024, in the Eastern District of Virginia and elsewhere, the defendant **ANTONIO STOWES a/k/a “Tone”**, knowing that he had been previously convicted of a felony crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess, in and affecting interstate or foreign commerce, a firearm, to wit: a stolen Glock .38 caliber handgun.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)).

COUNT NINETY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2024, in the Eastern District of Virginia and elsewhere, the defendant **ANTONIO STOWES a/k/a “Tone”**, knowing that he had been previously convicted of a felony crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess, in and affecting interstate or foreign commerce, a firearm, to wit: a Glock 9mm caliber handgun.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)).

COUNT ONE HUNDRED

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 8, 2023, in the Eastern District of Virginia and elsewhere, the defendant **ANTONIO STOWES a/k/a “Tone”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute Fentanyl, a Schedule II controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT ONE HUNDRED ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 23, 2024, in the Eastern District of Virginia and elsewhere, the defendant **ANTONIO STOWES a/k/a “Tone”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT ONE HUNDRED TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 6, 2022, in the Eastern District of Virginia, the defendant, **CHRISTINA MICHELE THOMPSON**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT ONE HUNDRED THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 4, 2020, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **NAJAE VAUGHN a/k/a “Laylo”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of Fentanyl, a Schedule II controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT ONE HUNDRED FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 21, 2020, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **NAJAE VAUGHN a/k/a “Laylo”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of Fentanyl, a Schedule II controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT ONE HUNDRED FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 5, 2023, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **NAJAE VAUGHN a/k/a “Laylo”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT ONE HUNDRED SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 1, 2023, in the Eastern District of Virginia, the defendant, **NAJAE VAUGHN a/k/a “Laylo”** did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT ONE HUNDRED SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 5, 2023, in the Eastern District of Virginia and elsewhere, the defendant **NAJAE VAUGHN a/k/a “Laylo”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT ONE HUNDRED EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 16, 2023, in the Eastern District of Virginia and elsewhere, the defendant, **THADDEUS WILLIAMS IV a/k/a “Thad”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT ONE HUNDRED NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 8, 2023, in the Eastern District of Virginia and elsewhere, the defendant, **THADDEUS WILLIAMS IV a/k/a “Thad”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of Fentanyl, a Schedule II controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT ONE HUNDRED TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 26, 2020, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **THADDEUS WILLIAMS IV a/k/a “Thad”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT ONE HUNDRED ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 24, 2022, in the Eastern District of Virginia, the defendant, **THADDEUS WILLIAMS IV a/k/a “Thad”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT ONE HUNDRED TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about the January 16, 2023, in the Eastern District of Virginia and elsewhere, defendant **THADDEUS WILLIAMS IV a/k/a “Thad”**, traveled in interstate commerce from the State of Virginia to the State of California, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

(In violation of Title 18, United States Code, §1952(a)(3))

COUNT ONE HUNDRED THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 8, 2023, in the Eastern District of Virginia and elsewhere, the defendant **THADDEUS WILLIAMS IV a/k/a “Thad”**, knowing that he had been previously convicted of a felony crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess, in and affecting interstate or foreign commerce, a firearm, to wit: a Glock 10mm caliber handgun.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)).

COUNT ONE HUNDRED FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 4, 2023, in the Eastern District of Virginia and elsewhere, the defendant **THADDEUS WILLIAMS IV a/k/a “Thad”**, knowing that he had been previously convicted of a felony crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess, in and affecting interstate or foreign commerce, a firearm, to wit: a Glock handgun.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)).

COUNT ONE HUNDRED FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 8, 2023, in the Eastern District of Virginia and elsewhere, the defendant **THADDEUS WILLIAMS IV a/k/a “Thad”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute fentanyl, a Schedule II controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT ONE HUNDRED SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 4, 2023, in the Eastern District of Virginia and elsewhere, the defendant **THADDEUS WILLIAMS IV a/k/a “Thad”**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute marijuana, a Schedule I controlled substance and oxycodone, a Schedule II controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT ONE HUNDRED SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 8, 2023, in the Eastern District of Virginia, the defendant, **THADDEUS WILLIAMS IV a/k/a “Thad”**, knowingly and unlawfully possessed a machinegun, that is, a conversion device for a Glock-type pistol, bearing no manufacturer’s marks of identification or serial numbers, designed and intended solely and exclusively for use in converting a weapon into a machinegun.

(In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2)).

COUNT ONE HUNDRED EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between January 2023 and April 2023, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **THOMAS WILSON a/k/a “Chinkman”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT ONE HUNDRED NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 27, 2022, in the Eastern District of Virginia, the defendant, **THOMAS WILSON a/k/a “Chinkman”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT ONE HUNDRED TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 1, 2022, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **GUANG YANG a/k/a “Ryan”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT ONE HUNDRED TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 12, 2022, in the Eastern District of Virginia, the defendant, **GUANG YANG a/k/a “Ryan”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT ONE HUNDRED TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 11, 2023, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **ALICIA ZAMORA** did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT ONE HUNDRED TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 5, 2022, in the Eastern District of Virginia, the defendant, **ALICIA ZAMORA**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

COUNT ONE HUNDRED TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about the January 11, 2023, in the Eastern District of Virginia and elsewhere, defendant **ALICIA ZAMORA**, traveled in interstate commerce from the State of Virginia to the State of California, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

(In violation of Title 18, United States Code, §1952(a)(3))

COUNT ONE HUNDRED TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 20, 2023, in the Eastern District of Virginia and elsewhere, the defendant, **TIESHA BEST a/k/a “TY”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT ONE HUNDRED TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 30, 2024, in the Eastern District of Virginia and elsewhere, the defendant, **TIESHA BEST a/k/a “TY”**, did unlawfully, knowingly and intentionally possess with intent to distribute a substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT ONE HUNDRED TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 24, 2022, in the Eastern District of Virginia, the defendant, **TIESHA BEST a/k/a “TY”**, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this indictment:

(All in violation of Title 21, United States Code, Section 843(b))

FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of the violation alleged in Count 1 of this superseding indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2:
 - a. Any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the violation;
 - b. Any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation; and
 - c. Any interest in, claims against, and property or contractual rights affording a source of control over the continuing criminal enterprise.
2. The defendants, if convicted of the violation alleged in Count 3 of this superseding indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, involved in the violation, or any property traceable to that property.
3. The defendants, if convicted of any of the violations alleged in Counts 2, 4-7, 10-15, 20-26, 28-30, 33, 37-38, 42, 44-45, 47-48, 50, 54-55, 58-61, 62-65, 69-72, 75, 78-80, 83, 87-88, 90-92, 94-97, 102-106, 108-111, 118-123, and 127 of this superseding indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2:
 - a. Any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the violation; and
 - b. Any property used, or intended to be used, in any manner or part, to commit, or to

facilitate the commission of, the violation.

4. The defendants, if convicted of any of the violations alleged in this superseding indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any firearm or ammunition involved in or used in the violation.

5. The defendants, if convicted of any of the violations alleged in Counts 43, 46, 49, 56, 81, 81, 112, and 124 of this superseding indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

6. The defendants, if convicted of the violation alleged in Count 40 of this superseding indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the violation.

7. The defendants, if convicted of either of the violations alleged in Count 77 of this superseding indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2:

a. Any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the violation; and

b. Any personal property used or intended to be used to commit the violation.

8. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

9. The assets subject to forfeiture include, but are not limited to:

Real Property and improvements located at 2426 Sanderson Road, Chesapeake, Virginia 23322

Real Property and improvements located at 42 Moss Avenue, Hampton, Virginia 23669
Real Property and improvements located at 215 Brooke Drive, Hampton, Virginia 23669
2021 Dodge Charger Hellcat, VIN 2C3CDXL98MH576574
2021 Dodge Durango Hellcat, VIN 1C4SDJH94MC716359
2019 Chevrolet Impala, VIN 2G1105S36K9151192
2022 Mercedes Benz S580, VIN W1K6G7GBXNA070117
2020 Lamborghini Urus, VIN ZPBUA1ZL8LLA06478
2015 Lincoln MKZ Sedan, VIN 3LN6L2JK5FR615175
2023 BMW 760i, VIN WBA33EJ07PCM35524
2021 Jeep Grand Cherokee Trackhawk, VIN 1C4RJFN99MC822749
2021 Dodge Charger GT, VIN 2C3CDXHG9MH644291
\$4,960.00 US Currency seized from a residence in Hampton, Virginia on September 14, 2023
\$12,261.00 US Currency seized from a residence in Spotsylvania, Virginia on September 14, 2023
\$1,910.00 US Currency seized from a residence in Portsmouth, Virginia on September 14, 2023
\$232,988.00 US Currency seized from a residence in Hampton, Virginia on January 9, 2024
\$27,894.00 US Currency seized from a residence in Yorktown, Virginia on July 5, 2023
\$34,304.00 US Currency seized from a residence in Hampton, Virginia on July 5, 2023

\$1,068.00 US Currency seized from a residence in Newport News, Virginia on September 14, 2023
\$2,441.00 US Currency seized from a residence in Virginia Beach, Virginia on September 14, 2023
\$1,781.00 US Currency seized from Nathan Schlosser-Goodson at the time of his arrest on September 14, 2023
\$148,240.00 US Currency seized from a residence in Yorktown, Virginia on September 14, 2023
\$13,118.00 US Currency seized from a residence in Newport News, Virginia on September 14, 2023
\$3,790 US Currency seized from a residence in Spring Grove, Virginia on November 8, 2023
\$145,100 US Currency turned over to FBI by Christina Thompson on February 5, 2024
\$17,620.00 US Currency seized from a residence in Newport News, Virginia on February 23, 2024
\$43,495.66 seized from Truist Bank account #XXX7280 in the name of Right on Time Rentals LLC
\$93,285.33 seized from Truist Bank account #XXX1608 and account #XXX1607 in the name of Stay On LLC
\$2,326.05 seized from Truist Bank account #XXX1610 and account #XXX1609 in the name of Zuri Reeves
\$31,120.00 seized from TowneBank account #XXX0688
Miscellaneous jewelry seized from a residence in Hampton, Virginia on September 14, 2023
Miscellaneous jewelry seized from a residence in Portsmouth, Virginia on September 14, 2023
Miscellaneous Jewelry and watches seized from a residence in Spotsylvania, Virginia on September 14, 2023
Miscellaneous jewelry seized from a residence in Hampton, Virginia on January 9, 2024
Miscellaneous jewelry and watch seized at Lux Auto on Jefferson Ave, Newport News, Virginia on September 14, 2023

Miscellaneous jewelry seized from a residence in Yorktown, Virginia on September 14, 2023
Miscellaneous Designer shoes, clothing, & accessories seized from a residence in Spotsylvania, Virginia on September 14, 2023
Miscellaneous Designer shoes, clothing, & accessories seized from a residence in Yorktown, Virginia on July 5, 2023
Louis Vuitton Monogrammed Card Holder seized from a residence in Hampton, Virginia on July 5, 2023
Miscellaneous Designer shoes seized from a residence in Hampton, Virginia on September 14, 2023
4 Lamborghini tires seized from Lux Auto in Newport News, Virginia on September 14, 2023
Miscellaneous designer shoes and bags seized at Lux Auto on Jefferson Ave, Newport News, Virginia on September 14, 2023
Cartier Demand sunglasses seized from Dontae Dozier at his arrest on September 14, 2023
Miscellaneous Designer Shoes, Clothing, & Handbags seized from a residence in Chesapeake, Virginia on September 14, 2023
Miscellaneous Designer Shoes, Clothing, & Accessories seized from a residence in Los Angeles, California on September 14, 2023
Louis Vuitton backpack seized from a residence in Newport News, Virginia on February 23, 2024
A Radical Firearms Rifle, model RF-15 with serial #19-100419 seized from a residence in Hampton, Virginia on September 14, 2023
A Phoenix Arms .25cal pistol, model HP25A with serial #4554434 seized from a residence in Hampton, Virginia on September 14, 2023
A Glock 27 pistol with serial #BAKH241 seized from a residence in Hampton, Virginia on September 14, 2023
All magazines and ammunition seized from a residence in Hampton, Virginia on September 14, 2023
A Glock 43X with serial #AHMS317 seized from a residence in Chesapeake, Virginia on September 14, 2023
All ammunition seized from a residence in Chesapeake, Virginia on September 14, 2023

A Springfield Amory .40cal XDM pistol with serial #MG297864 seized from a residence in Portsmouth, Virginia on September 14, 2023
A Glock 20 pistol with serial number BZVF568 seized from a residence in Portsmouth, Virginia on September 14, 2023
All magazines and ammunition seized from a residence in Portsmouth, Virginia on September 14, 2023
A Spike's Tactical 9mm AR pistol, model ST9G with serial #ARG009623 seized from a residence in Spotsylvania, Virginia on September 14, 2023
A FN 9mm handgun with raised sights with serial #GKS0180284 seized from a residence in Spotsylvania, Virginia on September 14, 2023
A Smith & Wesson M&P 9mm pistol with serial #NCY4188 seized from a residence in Spotsylvania, Virginia on September 14, 2023
A Taurus .410 gauge revolver, model Public Defender Poly with serial #E0378274 seized from a residence in Spotsylvania, Virginia on September 14, 2023
A Taurus .357 revolver, model Protector Poly with serial #KT17153 seized from a residence in Spotsylvania, Virginia on September 14, 2023
All magazines and ammunition seized from a residence in Spotsylvania, Virginia on September 14, 2023
A Glock 9mm pistol with serial #BHAC733, magazines, & ammunition seized from a Dodge Charger Hellcat at a residence in Spotsylvania, Virginia on September 14, 2023
All magazines and ammunition seized from a Dodge Durango Hellcat at a residence in Spotsylvania, Virginia on September 14, 2023
A Taurus G3C pistol with serial #ABM281001 seized from a residence in Hampton, Virginia on January 9, 2024
A Glock 19 pistol with serial #BTCS182 seized from a residence in Hampton, Virginia on January 9, 2024
An AK 9mm CD Defense pistol with serial #RONVMB71707242 seized from a residence in Hampton, Virginia on January 9, 2024
All magazines and ammunition seized from a residence in Hampton, Virginia on January 9, 2024
A Smith & Wesson STW pistol, model 5904 with serial #TDB0660 seized from a residence in Yorktown, Virginia on July 5, 2023
All magazines and ammunition seized from a residence in Yorktown, Virginia on July 5, 2023

A Glock 17 pistol with serial #BUNM504 seized from a residence in Hampton, Virginia on July 5, 2023
A Ruger 5.7 pistol with serial #641-85852 seized from a residence in Hampton, Virginia on July 5, 2023
Glock 22 pistol with serial #BSRD355 seized from a residence in Hampton, Virginia on July 5, 2023
All magazines and ammunition seized from a residence in Hampton, Virginia on July 5, 2023
A Taurus G2C 9mm pistol with serial #TLT74232 seized from a residence in Hampton, Virginia on September 14, 2023
All magazines, ammunition, weapon accessories seized from a residence in Hampton, Virginia on September 14, 2023
A Glock handgun with serial #BTUG853 seized from a residence in Hampton, Virginia on September 14, 2023
All magazines & ammunition seized from a residence in Hampton, Virginia on September 14, 2023
All magazines and ammunition seized from Lux Auto on Jefferson Ave, Newport News, Virginia on September 14, 2023
A Hi-Point JHP45 firearm with serial #X458327 seized from a residence in Newport News, Virginia on September 14, 2023
A Hi-Point magazine and ammunition seized from a residence in Newport News, Virginia on September 14, 2023
A Polymer80 9mm firearm with serial #PF940V2 seized from a residence in Yorktown, Virginia on September 14, 2023
A Glock 27 .40cal firearm with serial #TDN199 seized from a residence in Yorktown, Virginia on September 14, 2023
A Glock 17 9mm firearm with serial #BRDR605 seized from a residence in Yorktown, Virginia on September 14, 2023
A Glock 19X 9mm firearm with serial #BXYZ082 seized from a residence in Yorktown, Virginia on September 14, 2023
A Taurus 38 revolver with serial #FL83314 seized from a residence in Yorktown, Virginia on September 14, 2023
A Smith & Wesson firearm, model M&P15 with serial #SM54354 seized from a residence in Yorktown, Virginia on September 14, 2023

A Bushmaster XM15-E2S firearm with serial #BFH027888 seized from a residence in Yorktown, Virginia on September 14, 2023
A Sig Sauer P232 9mm firearm with serial #S328273 seized from a residence in Yorktown, Virginia on September 14, 2023
A Glock 19 9mm firearm with serial #BWSD757 seized from a residence in Yorktown, Virginia on September 14, 2023
A Taurus revolver with serial #ABM268478 seized from a residence in Yorktown, Virginia on September 14, 2023
A Zastova Arms firearm, model ZPAP92 with serial #Z92-082270 seized from a residence in Yorktown, Virginia on September 14, 2023
A Glock 19 9mm firearm with serial #BVGX498 seized from a residence in Yorktown, Virginia on September 14, 2023
A Smith & Wesson M&P firearm with serial #PJU4648 seized from a residence in Yorktown, Virginia on September 14, 2023
All magazines, ammunition, and holsters seized from a residence in Yorktown, Virginia on September 14, 2023
A Taurus G2C 9mm firearm with serial #TLT96593 seized from a residence in Newport News, Virginia on September 14, 2023
A Ruger SP101 firearm with serial #573-64941 seized from a residence in Newport News, Virginia on September 14, 2023
A FN FNX-45 firearm with serial #FX3U128473 seized from a residence in Newport News, Virginia on September 14, 2023
All magazines, ammunition, & holsters seized from a residence in Newport News, Virginia on September 14, 2023
Glock 20 firearm with serial #BXYR102 seized from a residence in Spring Grove, Virginia on November 8, 2023
All magazines & ammunition seized from a residence in Spring Grove, Virginia on November 8, 2023
A Glock 357 firearm with serial #UGE049 seized from a vehicle at Dontae Dozier's arrest in Portsmouth, Virginia on September 14, 2023
All magazines & ammunition seized from a vehicle at Dontae Dozier's arrest in Portsmouth, Virginia on September 14, 2023
American Tactical AR firearm, model OMNI Hybrid with serial #NS141498 seized from a residence in Chesapeake, Virginia on September 14, 2023

Masterpiece Arms MPA Defender 9mm firearm with serial #FX04639 seized from a residence in Chesapeake, Virginia on September 14, 2023
Mossberg International 715P rifle .22 caliber with serial #EUB4442425 seized from a residence in Chesapeake, Virginia on September 14, 2023
All magazines, ammunition, & weapon accessories seized from a residence in Chesapeake, Virginia on September 14, 2023
A Glock 19 9mm firearm with serial #ADNY365 seized from a residence in Los Angeles, California on September 14, 2023
All magazines and ammunition seized from a residence in Los Angeles, California on September 14, 2023
A Glock 23 .40 caliber firearm with serial #BUCX165 seized from a residence in Newport News, Virginia on February 23, 2024
All magazines and ammunition seized from a residence in Newport News, Virginia on February 23, 2024

(In accordance with Title 21, United States Code, Section 853; Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C), 982(a)(1), 982(a)(2), and 1029(c)(1)(C); and Title 28, United States Code, Section 2461(c).)

UNITED STATES V. CORTEZ DAYSHAWN BUMPHUS, ET AL. 4:23CR54

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

A TRUE BILL:

REDACTED COPY

FOREPERSON

JESSICA D. ABER
UNITED STATES ATTORNEY

By:



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